

Testimony of  
Victoria Rachmaninoff, Moms Clean Air Force Intern  
on  
July 17, 2018  
for  
Censored Science Hearing  
Docket Identification No. [EPA-HQ-EPA-HQ-OA-2018-0259]  
at  
EPA Headquarters  
William Jefferson Clinton East Building, Main Floor  
Room 1153  
1201 Constitution Avenue NW., Washington, DC 20460  
Public Hearing Testimony

Hello, my name is Victoria Rachmaninoff and I am from Winnetka, Illinois. I want to start by saying thank you for this opportunity to offer comment. I am deeply concerned about Acting Administrator Andrew Wheeler's attempts to censor science in the name of transparency and am here today to speak out against this proposed rule.

My mother grew up in a house of smokers. From infancy, her lungs were filled with the second-hand smoke of my grandmother, and later her older sister. While driving, the windows were kept shut no matter how many cigarettes were lit. Their home was no different. All throughout her life, until she herself started smoking, my mother breathed in the cigarette smoke of others, as studies showing the links between cigarettes and cancer were suppressed by the tobacco industry.

We now know that cigarettes can lead to more than just cancer; they also severely increase your risk of heart disease and stroke. My mother is 58 and I am thankful that she is still healthy. Her mother quit smoking at 68. This was not by choice. Just ten years older than my mother is now, she suffered from a massive brain hemorrhage. Her stroke left her paralyzed and nearly took her life.

In the early 1990s, when I was born, the tobacco industry tried to do something similar to what is being proposed now. In reaction to well respected, sound science, they created their own guidelines for "transparency" to discredit research showing the damaging impacts of second hand smoke. If they had gotten their way, my generation, a whole other generation, may have grown up inhaling second-hand smoke, just like my mother.

As early as the 1940s, the tobacco industry knew that cigarette smoking could cause cancer. While actively hiding this research, and producing cigarettes veiled as "safe," millions of Americans endowed this industry with misplaced trust. It took over 50 years to undo the detrimental effects of the tobacco industry's scientific cover-up. Countless people have died, and more will continue to die as a result. Now is not the time to let this injustice repeat itself.

Like cigarettes, pollution from smokestacks and tailpipes cause serious health problems and can even lead to death. Just as we have finally accepted the health impacts of cigarettes, it is time to accept that there are real, and consequential health impacts from pollution— and start dealing with them. Those industries want to avoid accountability for the harm they cause by throwing out the scientific evidence.

But while this ruling is being done under the guise of “transparency,” there is nothing secret about the science EPA uses to protect us. The EPA already makes available the scientific studies it relies on to make decisions. But many of those studies depend on the use private medical data that cannot and should not be made public. This rule is an excuse to discount these studies so they can weaken public health protections.

Today, I work for Moms Clean Air Force. I fight each day with over 1,000,000 parents and people dedicated to protecting children’s health. Before, I spent four years working with elementary and preschool children, in the field of education. The students I worked with all came from low-income families. And when I think about who will suffer most from this ruling, it is children like them. At the age of four, six, and ten their vulnerable lungs and bodies are highly susceptible to the effects of air pollution. And because of their income, they are more likely to live near dangerous sources of pollution.

This proposal means that many studies on young people, people of color, and low-income communities - groups who suffer disproportionately from pollution - would be excluded from EPA consideration. Making the data public could identify the participating individuals. And simply redacting information is not enough. The information required to be made public still would allow with simple decoding for the identification of participants. Perhaps even worse, excluding this important data from consideration could further exacerbate negative environmental impacts on these and other vulnerable communities.

The EPA has used transparent and sound science for decades. My family, the families I work with at Moms Clean Air Force, and millions of Americans are counting on the EPA to continue using this science, without putting our privacy at risk. I strongly urge the EPA to stop this radical proposal - for the health and safety of all Americans. Thank you very much.